



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MAR 19 2009

Donald K. Stern, Esq.
Cooley Godward Kronish, LLP
Prudential Tower, 46th Floor
800 Boylston Street
Boston, MA 02199

RE: Pre-MUR 474
First Allmerica Financial Life Insurance
Company Federal PAC

Dear Mr. Stern:

On July 7, 2008, you filed with the Federal Election Commission ("Commission") a *sua sponte* complaint on behalf of your client, First Allmerica Financial Life Insurance Company Federal PAC ("PAC"), indicating activity related to the PAC that may have violated provisions of the Federal Election Campaign Act of 1971, as amended. On March 4, 2009, based on the available information, the Commission dismissed this matter.

If you have any questions, please contact Audra Hale-Maddox, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

A handwritten signature in black ink that reads "Mark Allen".

Mark Allen
Assistant General Counsel

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